

May 17, 1999

Ms Jane Henney, Commissioner
Food and Drug Administration
5600 Fishers Lane, Room 14-71
Rockville, MD 20857

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Dear Ms Henney:

I'm writing to urge the FDA to act on a petition (Docket 99P-0033/CP 1) filed by the Humane Farming Association (HFA) and ban the practice of feeding farm animal remains to other food animals. This now common practice is a direct threat to human health because of the likelihood that livestock fed animal remains will develop fatal brain diseases that can be passed on to people when they eat infected meat.

In 1996, the British government announced that the fatal human Creutzfeldt-Jakob Disease (CJD) was linked to Mad Cow Disease (BSE) in cattle. Apparently, cattle that ate feed containing nervous system remains of sheep and goats infected with a similar disease developed the degenerative brain disease BSE. Then, people who were genetically vulnerable developed CJD after eating beef from diseased cattle.

Unfortunately, CJD and BSE have long incubation periods so that many years may pass before the symptoms of dementia appear and the true extent of infection throughout the population can be determined. Since food animals are herbivores by nature, their physiological systems have not developed with resistance to diseases spread by eating feed containing the remains of other animals, a practice which became common only recently with the advent of the factory farm. So, these diseases have not appeared earlier in history. But since 1996, 33 people in Britain have died from CJD. A panel of FDA scientists recently asked our government to prohibit blood donations from people who have lived in England during the last 20 years for fear that CJD-tainted blood could spread the disease in the U.S.

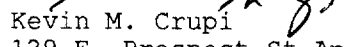
Cows and other livestock in this country also eat feed which contains the remains of animals that have developed similar brain diseases. Although some U.S. pigs have exhibited symptoms of BSE-related diseases, relatively few food animals here have become infected. But, livestock in the U.S. are slaughtered at an earlier age than in Britain, which means that even though they may be infected with the BSE organism, most food animals may not live long enough to develop observable symptoms.

The HFA and other groups have petitioned the FDA to take action to prevent the spread of BSE-related brain diseases. Their petition demands that:

- Blood and blood products from all mammals, including pigs and cows, must be prohibited for use in animal feed and pet foods;
- Gelatin and gelatin by-products must not be used in animal feed, as gelatin might carry infectious agents;
- Porcine materials must not be used in animal feed because U.S. pigs have exhibited symptoms of central nervous system disease similar to BSE;
- BSE-positive material absolutely must not be fed to any animals or be used in cosmetics, fertilizer, or other products.

Please act on Docket 99P-0033/CP 1 as soon as possible. Don't wait any longer to stop this potentially devastating brain-disease epidemic. Thank you.

Sincerely yours,

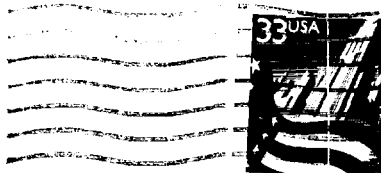

Kevin M. Crupi
129 E. Prospect St Apt A
Marquette, MI 49855

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Mr. Kevin M. Crupi
129 E. Prospect St. # A
Marquette, MI 49855-3729



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